

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 89-139

CITY AND COUNTY OF SAN FRANCISCO

AMENDING ORDER NO. 88-134, REQUIRING THE CITY AND COUNTY OF SAN FRANCISCO TO CEASE AND DESIST DISCHARGING WASTE FROM ITS RICHMOND-SUNSET WATER POLLUTION CONTROL PLANT AND FROM ITS SOUTHWEST OCEAN OUTFALL CONTRARY TO EFFLUENT LIMITATIONS IN ORDER NO. 88-106

The California Regional Water Quality Control Board, San Francisco Bay Region (Board) finds that:

1. On June 15, 1988, the Board adopted Order No. 88-106, revising waste discharge requirements for the City and County of San Francisco (City) for its Richmond-Sunset Water Pollution Control Plant and Southwest Ocean Outfall. This action represented final state concurrence on a waiver of secondary treatment requirements. EPA issued a 301(h)-modified permit for this discharge on July 7, 1988, although this permit action was stayed by requests for an evidentiary hearing.
2. On August 17, 1988, the Board adopted Order No. 88-134, requiring the City to cease and desist discharging waste from the above facilities contrary to the effluent limits in Order No. 88-106. The enforcement order established interim effluent limits for two pollutants and a compliance schedule for completing a new plant to replace the Richmond-Sunset plant.
3. The City has complied with Order No. 88-134 to date. The City completed its design of the new sewage treatment plant before the deadline specified in this order.
4. The City is threatening to violate effluent limits in Order No. 88-106 and interim effluent limits in Order No. 88-134, as shown below:

Parameter	Affected Order:		Cause of Potential Violation:	
	88-106	88-134	Drought	Decant
Suspended solids		X	X	X
Oil and grease		X	X	X
Turbidity	X		X	

Toxicity con- X
centration

5. Water conservation associated with the current drought has increased the concentration of waste influent to the Richmond-Sunset plant. Given the plant's limited treatment capability, some of this increased concentration is reflected in its effluent. There are no feasible measures that could be taken to improve treatment plant performance during drought conditions and pending completion of the new sewage treatment plant.
6. Interim effluent limits in Order No. 88-134 do not account for the discharge of decant to the ocean outfall during wet-weather periods. The Westside Transport stores combined sewage and storm runoff that would otherwise discharge to the shoreline. Decant from the Westside Transport mixes with Richmond-Sunset plant effluent prior to ocean discharge. During periods when decant is discharged to the ocean outfall, interim effluent limits in Order No. 88-134 may be exceeded. There is no feasible way to reduce the volume of decant discharged or to further treat combined sewage-runoff prior to discharge.
7. Interim effluent limits are needed for toxicity concentration (acute toxicity as measured by a 96-hour bioassay). Self-monitoring results for the last year indicate that the Richmond-Sunset plant is unable to meet toxicity concentration limits in Order No. 88-106, despite meeting other effluent limits and being operated in an optimal manner. Special studies conducted by the City demonstrate that acute toxicity is not caused by un-ionized ammonia, and that chronic and acute toxicity concentrations are similar.
8. This action is an order to enforce waste discharge requirements previously adopted by the Board. This action is therefore categorically exempt from provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15121 of the Resources Agency CEQA Guidelines.
9. The City and interested persons have been notified of the Board's intent to take this enforcement action, and have been provided an opportunity to submit written comments and appear at the public hearing.
10. At a public hearing on August 16, 1989, the Board heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED THAT:

- A. Order No. 88-134, a Cease and Desist Order issued to the City and County of San Francisco, shall be amended as shown below.
- B. Finding 6 shall be revised to add turbidity and toxicity concentration to the list of parameters:
 - 6. The City is violating or threatening to violate several effluent limitations in Order No. 88-106 (item B.1.a):

Parameter	Monthly Average	Weekly Average	Daily Maximum
Suspended solids (mg/l)	60	90	120
Grease and oil (mg/l)	25	40	75
Turbidity (NTU)	75	100	225
Toxicity concentration (tua)	1.5	2.0	2.5

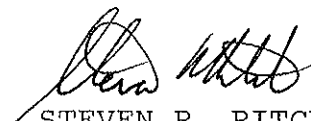
- C. A new finding 11 shall be added (and existing findings 11 and 12 renumbered accordingly):
 - 11. Water conservation associated with the current drought has increased influent concentrations at the Richmond-Sunset plant during dry-weather months, exacerbating the plant's ability to meet effluent limits for suspended solids, oil/grease, and turbidity. In addition, during wet-weather periods, increased effluent flows to the plant and decant from the Westside Transport to the ocean outfall reduce effluent quality for several pollutants, notably suspended solids and oil/grease. In addition, older plant design prevents the City from meeting effluent limits for toxicity concentration, despite optimal plant operation.
- D. Provision C shall be revised to incorporate revised interim effluent limits:
 - C. The City shall comply with the following interim effluent limitations pending the completion of tasks identified in section B. This order will have no effect on other effluent limitations or requirements of Order No. 88-106 that are already in effect.

Parameter	Monthly Average	Weekly Average	Daily Maximum
Suspended (mg/l) (1) solids (lb/day) (2)	100 (3) 18,300	150 (3) 27,500	200 (4) 36,700
Grease (mg/l) (1) and oil (lb/day) (2)	45 (3) 8,300	67 (3) 12,300	90 (4) 16,500
Turbidity (NTU) (1)	75	100	225
Toxicity concentration (tua) (5)	2.5	4.0	4.0

Notes:

- (1) Concentration limits apply only during calendar months when average monthly flow is 19 million gallons per day (mgd) or greater. Calendar weeks that straddle two months should be included in the month containing the most days of that week.
- (2) Mass loading limits apply only during calendar months when average monthly flow is less than 19 mgd. Mass loading limits are based on interim limit concentrations at a 22 mgd flow rate (plant's average dry weather flow).
- (3) On days when decant is discharged from the Westside Transport to the ocean outfall, effluent limits for suspended solids and oil/grease may be met at the Richmond-Sunset plant, before decant is present in the discharge. The City shall operate the Westside Transport and related wet-weather facilities in an optimal manner, consistent with Regional Board Order No. 87-110 (NPDES Permit No. CA0038415 for Westside wet-weather diversion structures).
- (4) Daily limits for suspended solids and oil/grease will not apply on days when decant is discharged to the ocean outfall or when the Westside Transport is being dewatered.
- (5) Toxicity concentration is defined as 100 divided by the LC50 concentration. The City shall determine the LC50 concentration using a 96-hour static renewal bioassay.

I, Steven R. Ritchie, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on August 16, 1989.



STEVEN R. RITCHIE
Executive Officer